

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CASE NO. 4:22 CR 692 RLW JMB
v.)	
)	
CARL HART,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Christine Krug, Assistant United States Attorney for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged with a count of deprivation of rights, in violation of 18 U.S.C. §242, an offense for which a maximum of ten years imprisonment is prescribed under Title 18 and two counts of possession of child pornography, in violation of 18 U.S.C. §2252A(a)(5)(B) for which a maximum of twenty years imprisonment for each count is prescribed under Title 18.
2. Upon motion of the attorney for the government, a detention hearing shall be held when the case involves a crime of violence pursuant to 18 U.S.C. §3142(f)(1)(A). As defined in 18 U.S.C. §3156(a)(4)(A), a crime of violence is an offense that has an element of the

offense the use, attempted use, or threatened use of physical force against the person or property of another. The underlying crime in count 1 of deprivation of rights is the use of unreasonable force on an inmate while the inmate posed no danger to the Defendant or others and resulted in bodily injury to the inmate.

3. The Defendant is currently under indictment in state court in St. Francois County, Missouri (cause number 22SF-CR00828-01). That indictment charges the Defendant with three counts of Possession of Child Pornography, two class B felonies and one class D felony. The range of punishment on each of the class B felonies is five to 15 years incarceration and the range of punishment on the class D felony is up to seven years incarceration.
4. The Defendant has been detained in the above-referenced case since his arrest on June 29, 2022. The bond in that case is set at \$250,000 cash or surety.
5. There is a serious risk that the Defendant will flee, given the potential sentences that the defendant faces, and the strength of the evidence in this case.
6. The nature and circumstances of the offenses charged reflect that a serious danger to the community would be posed by the defendant's release. As such, there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Christine Krug
CHRISTINE KRUG, #42586MO
Assistant United States Attorney